

I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

My opinion of RM-10811 is that portions deserve serious consideration by the Commission and the amateur radio community.

My specific comments are:

Introduction

1. I would refer the reader to RM-10807 Appendix A by Walter Fair, W5ALT
2. I concur

Amateur Radio in...

3. As written in Part 97, amateur radio is a service; the word "hobby" does not appear therein, even though others would have us believe that the word is in large print. In Docket 98-143, page 19, the FCC stated "We are persuaded that because the amateur service is fundamentally a technical service" and went on to justify the downgrading of telegraphy at the end of that paragraph.

I heartily approve of the push to get younger people involved, but am somewhat hesitant to see those licensed with ages that seriously imply their inability to understand the technical ramifications of their license class.

4. I agree. 97.1(a) refers to our ability to serve in emergency situations and this is one way we pay our dues to the nation. We need to have a highly skilled, knowledgeable and enthusiastic operator base.

General Principles

5. I concur.

Retain Morse Code Testing...

6. I would also note that Part 95 does not include a "Basis and Purpose" section.
7. Very true.
8. Sentence 1, true. No comment on the rest.

9. I concur.

10. I wonder what percentage of amateurs today build their stations from scratch. We mostly read the catalog, buy the rig and then try to decipher the manual enough to get it on the air. Compare this to the time when receivers and transmitters were separate units and had to be interwired for control by the amateur at the station, along with any accessories.

11. Please see comment for paragraph 6.

12. I have had a problem defining "qualified". Somehow, answering 90 of 120 memorized questions and copying 25 straight characters does not an expert make. Are we following the letter or the spirit of the law?

A Licensing Path..

13. Over the years, I have seen in QST, glowing reports that young Teddy Ham, aged 5, has gotten a license. I do not question the FISTS data that there have been six year old Extras; I am curious as to who they are, when they were licensed and especially, are they still active?

14, 15 I concur.

Examples of CW's Role...

16. I concur.

17. Searching the Internet shows that there are now AM broadcast transmitters using class E final circuitry. Building, testing and using CW is the easiest way.

18, 19 No comment.

Technician Class...

20. I agree that the written should be revised. The actual means by which this is done seems to be universally unstated.

21. Technician Plusses now have full access to the Novice frequencies. The increased use of digital is inevitable for all licensees. But how many of the current 32,936 Novices are active and what would be the implications on their band usage?

22. Excellent point.

General Class:

23. I concur.

24. I concur heartily, given the FCC's position in 98-143. Specifically, how would the Question Pool and testing be augmented? Specifically, how would "technical competence" be accurately determined? I would like to see some "hands-on" testing: work out Ohm's/Watt's Law and other math problems, fill-in questions, oral portions of the test (like the FAA), solder or assemble circuits and coaxial connectors, build and test a simple antenna to a given frequency, identify common components. The list goes on.....

25. I fully agree.

Extra Class...

26. 12 WPM is an interesting speed. It limits dot-dash copy and is above the speed where belated deciphering can be done. At this point, there is the recognition of characters and that information is sent to the fingers for transcription. Also, at about 18 WPM, the brain starts to integrate the data.

See 24 for testing details.

27. Excellent!!

28. I definitely concur.

29. I wholeheartedly concur.

End Instant Testing...

30. HOORAY!!! I emphatically concur. When the FCC gave exams, there was a 30 day retest period (60 days for commercial licenses). Perhaps a 14 day (two week) minimum retest wait would be appropriate. At our VE sessions, I would guess that there is about a 20% retest rate.

31. There would be a possible tracking issue. Joe Ham could fail an element on Saturday morning, go to another session that afternoon, fail again and finally pass it somewhere else on Sunday. Who would know, since he used three different VEC's?

A simple solution:

Since the VE session manager sends the report to the VEC and the VEC's are under the NCVEC, all reports should go to the FCC via the NCVEC (isn't this what they are for?). Yes, actions could be delayed by a day or two, but this isn't like the weeks in the old FCC days. Merely by scanning an NCVEC database by name, element taken, and date range, Joe would pop up. Now what? His new licensing action would be invalidated by registered letter and a note put in his file by the FCC, each administering VE manager would get a notice and Joe would be barred from taking any further test for a certain amount of time. If he does it again, the time would be increased.

Maintain Qualification Standards

31 through 35 I fully agree with this position. I am rapidly coming to the conclusion that the NCVEC is a loose cannon, with little administrative control and accountability to the amateur community at large. Although it was within their purview to file a petition, I am disappointed they did since they have a large vested interest.

Conclusion:

36, 37 I generally agree.

I do note that nothing has been said about the Novice and Advanced classes and wonder what should be done to encourage them to upgrade, even though this may not be appropriate for this discussion.

Therefore, I would generally support this RM.

Thank you for reading and considering my view on this Rulemaking.

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